ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In the Matter of	)	
	)	
Implementation of the Pay	)	CC Docket No. 96-128
Telephone Reclassification and	)	
Compensation Provisions of the	)	
Telecommunications Act of 1996	)	

PETITION FOR RECONSIDERATION

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October 21, 1996

SUMMARY

Cable & Wireless, Inc. ("CWI") believes the Commission must reconsider its Report and Order on payphone compensation for several important reasons. These include: (1) the use of local coin rates as a surrogate for calculation of the amount of compensation, instead of a cost-based method, is fundamentally flawed; (2) the interim compensation plan discriminates among carriers receiving compensable calls; and (3) the use of the term "facilities-based" in allocating responsibility is confusing.

Local coin rates are not a proper surrogate for access code and subscriber 800 calls because the extra costs of handling coin payment are not present. Coin calls require coin collection, coin signalling and LEC per-minute line charges. All of these costs are avoided with access code and subscriber 800 calls. In fact, there is virtually no cost to the payphone service provider ("PSP") when such calls are placed.

Further, the approach employed by the Report and Order will subject CWI and other IXCs to unavoidable and unrecoverable costs, possibly leading to a decrease in payphone service. This problem stems from the Commission's decision to allow PSP per-call compensation rates to vary after two years. At that time, CWI will be faced with carrying compensable calls without the ability to discern the identity of the originating PSP or its individual compensation rate. Lacking that information, CWI will be unable to make an informed decision concerning whether to block the call.

Discrimination among carriers receiving compensable calls is caused by the Commission's decision to impose interim payment obligations only on IXCs with $100 million or more in annual revenues. Smaller IXCs and LECs are not required to contribute, despite receiving compensable calls. The inevitable result of this FCC decision is either that

PSPs will not receive compensation for "each and every call" (if no compensation is paid for calls to small IXCs and LECs), or that an entity other than the primary economic beneficiary will be required to pay (if large IXCs are paying for calls to small IXCs and LECs). Either case requires reconsideration.

Finally, the Report and Order requires "facilities-based" carriers to pay for their resale carrier customers. CWI is unable to determine whether it fits the definition of "facilities-based" or reseller for this purpose, and thus seeks clarification on this issue.

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PETITION FOR RECONSIDERATION

Cable & Wireless, Inc. ("CWI"), by its attorneys, respectfully submits the following petition for reconsideration of the Commission's *Report and Order* ("*R&O*") in the above-captioned matter.[1] CWI requests that the Commission modify its interim per-phone compensation plan so that all providers of toll services pay a *pro rata* share of the compensation amount. CWI also requests that the Commission reconsider the amount of prescribed compensation, both for its interim and permanent compensation plans. In addition, CWI requests that the Commission clarify or, in the alternative, reconsider several other aspects of its compensation plan.

I. INTRODUCTION

CWI is an interexchange carrier which primarily serves business customers throughout the United States. It provides switched and private line data and voice communications, prepaid calling cards, Internet access and basic local exchange service. With revenues of nearly $750 million in 1995, CWI ranked as the sixth largest domestic

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[1] *Implementation of the Pay Telephone Reclassification and Compensation Provisions of the Telecommunications Act of 1996*, Report and Order, CC Docket No. 96-128, FCC 96-388 (rel. Sept. 20, 1996). In accordance with paragraph 300 of the *R&O*, CWI submits this petition within 30 days from the release of the order.

interexchange carrier in the nation. The company has experienced double-digit growth for the last five years.

Section 276 of the Act requires the Commission to establish a plan to ensure PSPs are "fairly compensated" for calls originating from their payphones. In its comments, CWI stressed that the Commission should clearly and fairly define the calls for which compensation would be owed. In addition, CWI recommended that the Commission adopt a system to compensate PSPs which would result in the lowest transaction costs for all parties, deter fraudulent attempts to increase compensation and build upon existing procedures already in place between industry participants.

In the *R&O*, the Commission ordered carriers receiving calls from payphones to pay compensation to the PSP. It decided to base the amount of this compensation upon the rates that PSPs charge (or will charge) for local coin calls in a deregulated environment. The Commission concluded that the local coin rate was "the best surrogate for payphone costs" incurred in originating compensable calls, and rejected other measures of identifying what is fair compensation to PSPs.

The administration of this compensation will occur in three stages. In the first stage, compensation will be paid to PSPs on a flat, per-phone basis, rather than per-call compensation. The per phone amount was derived using $0.35 per call to represent the deregulated local coin rate, multiplied by an estimate of the average number of calls received by payphones. Applying this formula, the Commission ordered that PSPs receive a total amount of $45.85 per phone per month.[2] The Commission ordered only interexchange carriers ("IXCs") with greater than $100 million in annual revenues to pay compensation during this initial period, with each of these IXCs paying a share of the $45.85 total in proportion to its relative share of gross revenues.

After the initial stage expires, the Commission ordered payphone compensation to be made on a per-call basis. During this stage, compensation will be based upon a default rate of $0.35 per call, again based upon an estimate of what a deregulated local coin rate will be. Unlike the per-phone compensation, however, all carriers receiving compensable calls will be subject to the compensation plan, not just the largest interexchange service providers. Carriers receiving calls will be required to track the number of calls received and provide PSPs with a statement of such calls at the time they provide compensation.

The third stage, and permanent, stage of compensation will operate the same as the second stage with one exception. During the third stage, the Commission no longer will prescribe a specific rate as the default compensation amount. Instead, the default rate (to apply in the absence of an agreement between the carrier and the PSP) will be equal to whatever rate that particular payphone has established for local coin calls. Compensation from carriers will vary as the local coin rate varies among PSPs.

CWI submits that the Commission's compensation plan is arbitrary and capricious and exceeds the Commission's statutory authority for several reasons. First, the

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[2] LEC payphones are not included in the per-phone compensation stage, however, because during this period LECs will still be receiving subsidies derived from their provision of local exchange services.

Commission's use of local coin rates as a surrogate for other PSP costs is fundamentally flawed. By basing compensation upon a rate the PSP establishes for coin calls, rather than upon the PSP's marginal costs for originating non-coin calls, the Commission has granted PSPs a windfall which exceeds the statute's requirement that compensation to PSPs be "fair." Second, the Commission's interim per-phone compensation is contrary to Section 276 because it requires a subset of carriers receiving compensable calls to pay compensation that apparently includes calls routed to non-paying carriers. Finally, the *R&O* should be modified and/or clarified to describe when a carrier is obligated to pay compensation and to address calls to carrier re-origination platforms.

II. THE COMMISSION'S USE OF LOCAL COIN RATES AS A SURROGATE FOR COMPENSATION IS FUNDAMENTALLY FLAWED AND SHOULD BE REPLACED WITH COST-BASED COMPENSATION

In several places in the *R&O*, the Commission recognizes that "fair" compensation depends upon the PSP's costs. For example, citing a conclusion it reached in its Notice of Proposed Rulemaking, the Commission states that under Section 276, "PSPs should be compensated for their costs in originating . . . calls using their payphones."[3] However, despite its endorsement of cost-based compensation, the Commission chooses not to establish a rate derived through an examination of PSP costs. Instead, the Commission adopts an assumption that local coin rates, if deregulated, will reflect PSP costs for

[3] *R&O* at ¶ 67; *see also id.* at ¶ 70.

originating calls from its payphones, and therefore adopts the rate as a surrogate for cost-based compensation for access code and subscriber 800 calls.

As CWI demonstrates below, local coin rates are not a valid surrogate for PSP costs, and in fact will overcompensate PSPs with many multiples of what is necessary to recover their costs. Moreover, by allowing compensation to fluctuate with a deregulated rate, the Commission subjects carriers to unknowable and unavoidable costs of doing business. The result will be a reduction in payphone services available to callers and gives the largest PSPs an unfair competitive advantage over their competitors. Finally, fluctuation of compensation rates encourages PSPs to strategically price local coin calls to maximize hidden surcharges to access code callers.

A. Local Coin Rates Should Not Be Used as a Surrogate for Costs of Other Payphone Calls

The Commission asserts that the rate a PSP charges end users for placing a local call is the best surrogate for the cost the PSP incurs in originating other types of calls from the payphone.[4] This assertion does not withstand scrutiny.

First, the costs associated with local coin calls are greater than those associated with other types of calls placed from the payphone. Local coin rates must, of course, cover the cost of collecting monies deposited in the phones and of monitoring the coin call for duration and coin deposit. Coin rates must include costs associated with the inclusion of a

[4] R&O at ¶ 70.

coin mechanism on a payphone, the cost of personnel to collect the monies deposited in the phones on a periodic basis, the accounting costs of processing this income, and the cost of coin signalling capabilities to monitor time and usage on the call. These differences significantly increase the cost of a local coin call compared to access and subscriber 800 calls.

A second reason why local coin rates are an improper surrogate is that, like 0+ call commissions, the rate for a local coin call may incorporate "other factors" not related to the cost of the call.[5] Most notably, a local coin rate could be set to recover locational monopolies associated with the phone. For example, at many phone locations, the caller will as a practical matter have no opportunity to seek out other phones for a lower coin rate, whether because of the distance between phones or due to time considerations. In either instance, the caller will be vulnerable to charges which exceed a normal rate for such calls.

Indeed, the Commission's compensation plan itself creates incentives for PSPs to price local coin calls based upon considerations unrelated to their costs of originating such calls. Because the local coin rate also acts as a hidden surcharge for access code and toll-free calls, PSPs will have significant incentives to engage in strategic pricing of local calls. Put simply, if the PSP knows that the local coin rate also acts as its surcharge on other calls, it might choose to set local coin rates to maximize its surcharge revenues. Any loss in local coin revenue from this strategy could easily be recouped from interexchange carriers subject

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[5] Cf. R&O at ¶ 69 (noting that 0+ commissions include compensation for factors other than the use of the payphone).

to the hidden surcharge. For example, CWI would expect that locations with high volumes of access code or toll-free calls but low volumes of local coin calls will select a local coin rate of $1 or more per call. Clearly, such a result would lead to higher rates for consumers, even when they dialed around in order to avoid high OSP rates. Moreover, because the compensation mechanism does not have to be posted as such on the phone, unwitting consumers may end up paying surcharges for access code calls that are higher than 0+ surcharges.

For these reasons, the rate a PSP charges for local coin calls is not a sufficient substitute for PSP costs incurred in originating access code and subscriber 800 calls. Instead, CWI urges the Commission to base compensation upon the marginal costs a PSP incurs in originating these calls. If the Commission continues to use local coin rates as a surrogate, however, it must at least adjust the rate downward to reflect cost savings the PSP experiences and to account for the potential for strategic pricing by PSPs.

B. <u>The Use of Local Coin Rates as Default Compensation Amounts will Subject Carriers to Unavoidable and Unrecoverable Costs and Lead to a Decrease in Payphone Service</u>

After an initial transition, the Commission will allow compensation to vary from PSP to PSP, based upon the rate that the PSP charges for local coin calls. Moreover, the compensation rate will vary over time from a given payphone, as the PSP adjusts its coin rate. This plan, in addition to creating the opportunities for strategic pricing discussed above, subjects toll carriers to significant unknowable and uncontrollable costs without adequate opportunity to recover the costs. Accordingly, the plan arbitrarily imposes charges upon carriers subject to the compensation obligation.

As a carrier that receives calls originating from payphones, CWI will have no way of knowing the rate charged by a PSP for a particular payphone ANI. In order to make an informed decision prior to receiving a call from a given payphone, CWI must know two key pieces of information, the name of the PSP that owns the phone and the current rate that PSP charges for local coin calls. Unfortunately, neither piece of information will be available to CWI. First, the only potential source of PSP ownership information is the COCOT lists provided by LECs. However, those list consistently contain significant errors and, in any event, are created based upon backward-looking information. Such information could be one to several months out of date, during which time the payphone could have been relocated or the PSP's ownership may have changed. Second, even if the PSP could be identified with accuracy, it will be impossible to determine the rate that PSP charges for local coin calls from that payphone. CWI cannot look this rate up in a tariff; the Commission deregulates local coin calls. Nor can CWI discern this information from the data it receives during the call set-up process. Similarly, signage on the telephone will not be of any use, because it conveys information to the caller, not the carrier.[6] Finally, CWI

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[6] In addition, the telephone signage will not disclose to the caller that the local coin rate also applies as a hidden surcharge on dial around and toll free calls.

could not even rely upon the rate it paid during the last compensation period, because the PSP may have selected a new rate for local coin calls since that time.[7]

Since the Commission's plan will make it impossible to predict costs in advance for accepting payphone calls, CWI will be unable to develop business plans which incorporate the payment of compensation to PSPs. Failure to develop a reasonable business cost means that shareholder and employee interests are at stake, and make it impossible for a company to launch such a product.

This difficulty is further compounded by the fact that, due to CWI's tariffing obligation, any attempt to pass the compensation surcharge along to CWI customers may not be permitted. Most states require licenses to identify tariffed charges with sufficient specificity. Even if CWI had some advance notice of payphone charges, it would be unable to modify its tariffs promptly enough to keep up with the thousands of changes likely to be made daily in the rates charged by PSPs nationwide. CWI expects that it will be forced to refuse payphone originated calls if the Commission's compensation plan takes effect. This will inconvenience, and possibly infuriate, many callers who are unable to complete their calls from payphones, certainly an unintended effect of the Commission's Order.

Finally, CWI notes that it simply cannot expend significant resources to negotiate compensation agreements with PSPs, since payphone originated calls represent a small contribution to overall revenues. At most, CWI might seek an agreement with large

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[7] Indeed, the potential that a PSP will fraudulently report its local coin rate, or retroactively adjust such rates, is uncontrollable. CWI has no way to verify the amount that PSPs report they charge for local coin calls.

PSPs -- such as the BOCs -- and select high volume payphone locations (airports, etc.). This strategy -- which is the only strategy CWI foresees as compatible with its business needs -- will lead to a diminution of competition in payphone services. Because the largest carriers will be able to offer unblocked access to a greater number of carriers, they will be able to exert considerable pressure upon location owners to select them as payphone service provider for the phone. Gradually, smaller PSPs will be frozen out of the market much like many OSPs were forced out of the hospitality market by AT&T's proprietary CIID card.

To avoid this result, CWI recommends that the Commission prescribe a specific amount as a default compensation rate, rather than identify an index from which the default rate will be derived. This amount should, as shown above, be based upon a PSP's costs in originating compensable calls.

III. THE COMMISSION'S INTERIM PER-PHONE PLAN UNLAWFULLY DISCRIMINATES AMONG CARRIERS RECEIVING COMPENSABLE CALLS

Section 276 requires the FCC to ensure compensation for "each and every" completed call originating from a payphone.[8] As the Commission stressed in the *R&O*, Section 276 creates "no exceptions" for calls received by certain telecommunications providers.[9] However, by limiting the interim per-phone compensation obligation to large interexchange carriers (over $100 million in annual revenues), the Commission allows

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[8] 47 U.S.C. § 276(b)(1)(B).

[9] *R&O* at ¶ 87.

precisely such an exception for local exchange carriers ("LECs") and hundreds of interexchange toll providers. CWI urges the Commission to correct this unwarranted departure from the statute by including within the per-phone obligation *all* carriers providing toll services, not just those who happen to be large providers of interexchange services.

In the *R&O*, the Commission determined that compensation must be prescribed for the following types of calls: interLATA and intraLATA access code calls, interLATA and intraLATA toll-free calls, and 0+ intraLATA calls.[10] Despite the mandate that each and every call be compensated, the Commission's interim plan excuses from the payment obligation two categories of carriers that benefit from these compensable calls: LECs and small IXCs. Neither exclusion can be justified under Section 276.

Both LECs and small IXCs receive the types of calls for which compensation is prescribed. In many states, LECs continue to have a monopoly on 0+ intraLATA calls from payphones, and in many instances receive such calls without paying any commissions to the premise owner.[11] In addition, a number of LECs, both BOC and independent, offer interLATA toll services, including services which rely upon an 800 access number.[12] Similarly, most IXCs, whether large or small, offer one or more 800 services and offer a calling card option with their 1+ services. Moreover, every operator service provider,

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[10] *R&O* at ¶ 52.

[11] *R&O* at ¶ 53.

[12] For example, according to *Communications Daily*, GTE is now offering interLATA toll services in 31 states. *Communications Daily*, October 17, 1996 at 4. Moreover, all of the BOCs have announced plans to offer out-of-region interLATA services, with at least a few currently offering such services. *See, e.g.*, WorldCom Comments at 7 n.12.

regardless of size, is required to have an 800 access number,[13] and many offer other methods of access code dialing as well.

That LECs and small IXCs receive compensable calls should come as no surprise. Nevertheless, the Commission wholly excuses these entities from the per-phone compensation plan. The Commission's only explanation being the alleged "administrative convenience of the parties" flowing from modeling compensation upon the existing access code compensation plan.[14] Putting aside the fact that it clearly is not "administratively convenient" for CWI -- a carrier *not* subject to current compensation obligations -- suddenly to have to pay compensation to thousands of PSPs, the Commission's rationale cannot be squared with the statute. In fact, elsewhere in the *R&O*, the Commission acknowledges that Section 276 requires participation of *all* carriers receiving calls from payphones. "[E]xemptions from the obligation to pay compensation," the Commission concluded, "*even on an interim basis*, would be contrary to the congressional mandate that we ensure fair compensation for 'each and every completed intrastate and interstate call.'"[15] This logic squarely applies to the interim per-phone plan ordered in the *R&O*.

Moreover, the Commission's interim compensation plan fails to follow the principle the Commission adopted for compensation: that the primary economic beneficiary of payphone calls should compensate PSPs.[16] The interim compensation amount of $45.85

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[13] 47 C.F.R. § 64.705(d).

[14] *R&O* at ¶ 119.

[15] *R&O* at ¶ 87.

[16] *See R&O* at ¶ 83.

per phone per month results from calculations which include calls routed to LECs and small IXCs.[17] However, because these carriers are excluded from the compensation plan, they receive the economic benefit of payphone calls but contribute nothing toward compensating PSPs for them. Instead, the remaining carriers, such as CWI, are being forced to compensate PSPs for calls which they did not receive. CWI clearly derives no economic benefit -- much less the primary economic benefit -- from calls routed to LECs and small IXCs. It is arbitrary and capricious, therefore, to require CWI to pay its share of the compensation while giving a free ride to the true economic beneficiaries of the calls.

Fortunately, the Commission's error can be corrected rather easily. The Commission should revise its interim compensation plan to include *all* carriers that may receive compensable calls. Thus, LECs, large IXCs, and small IXCs all should be required to participate in the per-phone compensation plan. CWI suggests that the Commission continue to use carrier gross revenues to apportion this compensation, but include the gross revenues of LECs and smaller IXCs in the compensation plan. A chart showing the revised compensation obligations using this standard is attached at Exhibit 1.

IV. THE COMMISSION MUST CLARIFY THE TREATMENT OF RESELLERS UNDER ITS COMPENSATION PLANS

After the period of per-phone compensation expires, the Commission requires individual carriers to pay compensation on a per-call basis. In order to reduce the compliance and enforcement burdens, the Commission concluded that "facilities-based

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[17] *R&O* at ¶ 124.

carriers should pay the per-call compensation for the calls received by their reseller customers."[18] CWI is unable to determine from this statement whether or not it would be obligated to pay per-call compensation, and accordingly seeks clarification of what the Commission intends by this statement.

CWI provides service to end users through a combination of its own facilities and those it obtains from other carriers. Depending upon the individual state requirements, CWI is certificated to provide intrastate service in some states as a resale carrier and in others as a facilities based carrier. Although CWI possesses its own switches and leases other call processing equipment, it obtains virtually all of its underlying transmission capacity for switched traffic from other carriers. Moreover, for international switched services, CWI operates exclusively as a reseller. CWI does not have ROA status, and has no operating or transiting agreements with foreign carriers.

As a result, CWI is not sure whether the Commission would classify it as a reseller or as a facilities-based carrier for compensation purposes. Also, it is unclear from the order whether a carrier can be facilities-based for domestic services and a reseller for international service. Accordingly, CWI asks that the Commission clarify its definition of a facilities-based carrier to identify which activities constitute the facilities-based provision of telecommunications services.

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[18] *R&O* at ¶ 86.

V. THE COMMISSION SHOULD ALLOW CARRIERS TO TREAT CALLS RE-ORIGINATED WITHIN THE CARRIER'S PLATFORM AS A SINGLE COMPENSABLE CALL

In the *R&O*, the Commission concludes that "multiple sequential calls made through the use of payphone's "#" button should be counted as separate calls for compensation purposes.[19] CWI requests reconsideration of this conclusion.

CWI believes that the Commission has imposed this requirement without adequate understanding of the difficulties associated with identifying this sequence for compensation purposes. However, using its present network configuration, CWI will be unable to identify calls originating from payphones in which a caller has used the "#" button reorigination feature. CWI uses ISDN-based platforms for its calling card and inbound 800 access capabilities. ISDN signalling, however, does not support the receipt of ANI information digits (i.e., the "07" or "27" payphone identification codes.) Thus, while CWI can identify an originating payphone call in its initial switching network through use of the 07 or 27 information digits, it cannot pass this information along to the ISDN platforms. This limitation is significant because the way that CWI records "#" re-originated calls for billing purposes is through session records internal to the ISDN platform. Without the ability to identify payphone originated calls on the ISDN session records, CWI cannot, for compensation purposes, track these calls as multiple calls. Instead, using CWI's switch

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[19] *R&O* at ¶ 63.

records on the originating and, a "#" re-originated call looks like a single call from the originating payphone.[20]

Because the # reoriginated call appears to CWI as a single call, CWI requests that the Commission reconsider its decision to require carriers to treat this sequence as multiple calls for compensation purposes. Classification of this sequence as a single compensable call is fair to PSPs because the caller dials only one call from the phone.[21]

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[20] It is possible to pass the 07 and 27 information digits along if the platform uses SS7 capabilities. However, the cost of converting a platform to SS7 exceeds $1 million per platform.

[21] The incremental cost of dialing additional digits is <u>deminimis</u>, if it is even measurable.

CONCLUSION

For the foregoing reasons, the Commission should reconsider those aspects of its *R&O* identified above.

Respectfully submitted,

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INTERIM COMPENSATION OBLIGATIONS

COMPANY	1995 TOTAL TOLL SERVICES REVENUES ($ IN MILLIONS)	% OF TOTAL TOLL REVENUES	AMOUNT PER PHONE PER MONTH ($)
AT&T Companies			
AT&T Communications	38,069	44.41%	20.361985
ALASCOM, INC.	325	3.79%	1.7337715
MCI Telecommunications Corp.	12,924	15.08%	6.91418
Sprint Communications	7,277	8.49%	3.892665
LDDS WorldCom	3,640	4.25%	1.948625
Frontier Companies:			
Allnet Comm. Svcs. dba Frontier Comm. Svcs.	827	0.96%	0.44016
Frontier Communications Int'l, Inc.	309	0.36%	0.16506
Frontier Comm. of the North Central Region	133	0.16%	0.07336
Frontier Communications of the West, Inc.	127	0.15%	0.068775
Cable & Wireless Communications, Inc.	700	0.82%	0.37597
LCI International Telecom Corp.	671	0.78%	0.35763
Excel Telecommunications	363	0.42%	0.19257
Telco Communications	215	0.25%	0.114625
MidCom Communications, Inc.	204	0.24%	0.11004
Tel-Sav, Inc. 9/	180	0.21%	0.096285
U.S. Long Distance, Inc.	155	0.18%	0.08253
Vartec Telecom, Inc.	125	0.15%	0.068775
GE Capital Communications	120	0.14%	0.06419
General Communication, Inc.	120	0.14%	0.06419
MFS Intelenet, Inc.	118	0.14%	0.06419
Business Telecom, Inc.	115	0.13%	0.059605
Communication Telesystem Int'l	115	0.13%	0.059605
Oncor Communications, Inc.	111	0.13%	0.059605
The Furst Group, Inc.	109	0.13%	0.059605
American Network Exchange, Inc.	101	0.12%	0.05502
All Other IXCs	*5,168*	*6.03%*	*2.88855*
All LECs	*13,395*	*15.63%*	*7.166355*
Total	**85,716**	**103.42%**	**47.54**